



OFFICE OF THE CHIEF EXECUTIVE OFFICER

Monica E. Goldson, Ed.D., Chief Executive Officer | ceo@pgcps.org
14201 School Lane | Upper Marlboro, MD 20772 | 301-952-6008 | www.pgcps.org/ceo

June 15, 2022

Mr. Richard P. Henry
Inspector General
Maryland Office of the Inspector General for Education
100 Community Place, 4th Floor
Crownsville, Maryland 21032

Dear Mr. Henry,

RE: Investigative Audit of Prince George's County Public Schools' State Aid Enrollment Counts (21-0006-A)

Prince George's County Public Schools (PGCPS) appreciates the efforts that the Office of the Inspector General for Education (OIGE) underwent in the most recent investigative audit focusing on September 30th enrollment counts used for determining State Aid funding. PGCPS takes great pride in its transparency and conservative reporting to ensure accuracy, fairness and accountability. The district is also appreciative for the man-hours that PGCPS staff contributed to respond to the multiple OIGE data requests. As a result of this audit, PGCPS has discovered a few needed corrections within the district's student information system and has identified enhancements to structures and processes that will improve the quality of future reporting.

To summarize, the objective of the OIGE audit was to determine whether the PGCPS students deemed eligible for state aid funding met Code of Maryland Regulations (COMAR) requirements for attendance and enrollment during the 2016-2017 school year through the 2020-2021 school year (five years). During this five-year window, from the two hundred and nine (209) PGCPS schools, more than fifty million (50,000,000) attendance records were aggregated to determine the enrollment status of more than six hundred sixty thousand (660,000) students in total. The OIGE discovered two hundred sixty-six (266) students who were erroneously identified as eligible for funding. This accounts for less than four hundredths of one percent (0.04%) of the overall studied student population. Although not within the declared objective of the audit, the OIGE also identified two hundred six (206) students who did meet the state aid funding requirements; thus, the actual count of erroneously identified students is reduced to sixty (60) which equates to less than one hundredths of one percent (0.009%). Equating this to dollars and cents, this is roughly an over allocation of less than a penny (\$.01) per every hundred dollars (\$100.00) allocated. This is an exciting finding providing strong validation of a challenging process. When considering the significance of the findings within this audit, one may question the need to respond. PGCPS, however, supports all continuous improvement efforts. With this in mind, the PGCPS responses to the four recommendations are as follows:

Recommendation 1 PGCPs should improve processes to adequately document and date withdrawals. At a minimum, training should be provided to individuals entering withdrawals into SchoolMax and data analysis should be conducted to identify discrepancies proactively. Centralization of parts of the process should be considered.

PGCPs Response:

Opinion (Concur/NonConcur): **Concur**

Corrective Action Plan (Provide Narrative Response):

PGCPs will more clearly define the role of the Attendance Clerks and Registrars as well as provide training focused upon record keeping best practices for their respective school buildings. All clerks and registrars will be required to attend and sign off on completing the training in order to have the user role functionality of amending school attendance and student records in the district's student information system, SchoolMax. The district will continue to utilize and update the Quick Reference Guides for Attendance Clerks and Registrars to facilitate communication processes in ensuring accurate data protocols/procedures are adhered to. Additionally, PGCPs has added additional data quality checks within the district's student information system that identifies instances where withdrawal dates are immediately preceded with days absent.

Current Status of Corrective Action (Implemented/Partially Implemented/Not Yet Implemented): Not Yet Implemented

Estimated Date of Full Implementation of Corrective Action: Beginning implementation SY 2022-2023

Recommendation 2 PGCPs should align their state aid coding practices for students with 10 or more consecutive unlawful absences covering September 30th with documented MSDE guidance.

PGCPs Response:

Opinion (Concur/NonConcur): **NonConcur**

Corrective Action Plan (Provide Narrative Response):

The *10 Day Rule* as referenced in MSDE's Student Records Manual states, "After 10 school days of consecutive unlawful absences, the student should be exited from the school with a Withdrawal Code 50 (Not Accessing Education Services)." To ensure accuracy, accountability, and transparency PGCPs's interpretation of the 10 Day Rule is for schools to *initiate* the withdrawal process for students when students reach the ten (10) days of unlawful absence.

Only when the investigation is concluded and the student's status of *Not Accessing Educational Services* is confirmed is the withdrawal executed. Meanwhile, all stakeholders continue to be held accountable for the student. The overwhelming majority of these reviews occur timely which, because the student's status is validated, improves the overall quality of PGCPs data.

When drafting the *10 Day Rule*, the rule was not intended to be absolute and is incomplete as written. When considering that the majority of the students that are identified under the *10 Day Rule* return, the rule fails to address the expectations of what to do when re-enrolling the students. Should there not be accountability for the student, the parent and/or the school for the prior grades, attendance and lost instructional time? Legally, within the language of the rule, *should* does not mean *shall* and the use of *should* was intentional. Not all districts are able to implement this rule with complete fidelity nor should they. The assignment of the *Not Accessing Education Services* requires due diligence of the system to ensure that this is the appropriate code. Often, especially during the opening of schools at the beginning of the school year, ten days is not a sufficient length of time to determine this to be the case, especially for a district the size of PGCPs. On average, PGCPs has approximately five thousand eight hundred (5,800) students to investigate and process during the month of September, annually.

To fully implement the *10 Day Rule*, there are several negative consequences to note, which include:

- The under-reporting of students affects both state and federal accountability reporting. By definition, any reported interruption in student enrollment at the school level during the school year results in the student no longer counting for the school for accountability purposes. During SY21, within PGCPs, there were twelve thousand six hundred thirty-four (12,634) instances where students met this rule. It is PGCPs' position that the schools should be held accountable for all students unless their exit codes are validated.
- Once withdrawn from the PGCPs student information system, SchoolMax, the student's schedule, corresponding transactional grades and attendance are no longer attached to the new enrollment record. Considerable effort is needed to re-enroll students. Of the twelve thousand six hundred thirty-four (12,634) instances, more than nine thousand five hundred (9,500) of these instances resulted in the students returning. Both the schools and the students continue to be held accountable for the absences and the students' achievements.

In an effort to maintain continuous improvement, PGCPs will attempt to reduce the burden on schools and supporting staff during the month of September by placing greater emphasis on summer registrations.

This will free up resources to conduct the needed reviews and investigations more timely. PGCPs will also more clearly define the role of the Registrars as well as provide training focused upon data entry best practices for their respective school buildings. Registrars will be required to attend and sign off on completing the training in order to have the user role functionality of amending student records in the district's student information system.

The district will continue to utilize and update the Quick Reference Guides for Registrars to facilitate communication processes in ensuring accurate data protocols/procedures are adhered to.

Current Status of Corrective Action (Implemented/Partially Implemented/Not Yet Implemented): Implemented

Estimated Date of Full Implementation of Corrective Action: Following MSDE policy review and shared guidance.

Recommendation 3 Prince George's County Public Schools should improve processes used to identify and withdraw chronically absent students during the beginning of each school year. At minimum, the processes should include:

- Real-time reporting by PPWs to ensure all potentially ineligible students are identified and reviewed by early October.
- Improved training and monitoring related to attendance recordkeeping by teachers, particularly at schools with fluid student enrollments.

PGCPs Response:

Opinion (Concur/NonConcur): **Concur**

Corrective Action Plan (Provide Narrative Response):

PGCPs has greater than twenty-six thousand (26,000) students newly enrolling from July 1 through September 30 each year. The main challenge contributing to this finding is the lack of time and resources needed to research the approximately five thousand eight hundred (5,800) students during the month of September, annually. PGCPs will attempt to reduce the burden on schools and supporting staff during the month of September by placing greater emphasis on summer registrations. This will free up resources to conduct the needed reviews and investigations more timely. PGCPs will also more clearly define the role of the Registrars as well as provide training focused upon data entry best practices for their respective school buildings. Registrars will be required to attend and sign off on completing the training in order to have the user role functionality of amending student records in the district's student information system. The district will continue to utilize and update the Quick Reference Guides for Registrars to facilitate communication processes in ensuring accurate data protocols/procedures are adhered to. Specific responses to the two sub recommendations are as follows:

- **Real-time reporting by PPWs to ensure all potentially ineligible students are identified and reviewed by early October.**

PGCPS maintains a number of reports accessible within the student information reporting system, APEX, that are available real-time and can be drawn down when students are absent to include *Attendance Summary Reports*, *Students with Five or More Absences*, and *Students Missing Attendance*. These reports provide information for students who are absent for reasons excused and unexcused.

Monitoring data to identify students who are absent for ten (10) consecutive days “unexcused” requires daily effort. PGCPS, through its Office of Student Applications, will now create a report accessible within APEX specifically for students with ten consecutive days unexcused absence to identify eligible students. Additionally, PGCPS will create a more efficient system of alerts to gauge when students are approaching ten (10) consecutive days of unexcused absences/reason unknown through its quality assurance software, Certify. Heretofore, Certify has been used to alert the district and school administrators of data errors. Certify will now be configured to communicate alerts to schools (designees) when students have five (5) days of unexcused absences; eight Investigative (8) and ten (10) days of unexcused absences. Due diligence to determine if students have transferred to another school district will now begin to occur by day eight (8) in order to identify the student's whereabouts. This will assist with being able to more accurately identify students eligible for withdrawal by ten (10) school days of unexcused absences.

- **Improved training and monitoring related to attendance recordkeeping by teachers, particularly at schools with fluid student enrollments.**

PGCPS will more clearly define the role of the Attendance Clerks and provide training focused upon record keeping best practices for their respective school buildings. All clerks and registrars will be required to attend and sign off on completing the training in order to have the user role functionality of amending school attendance records in the district's student information system, SchoolMax. The district will develop training for teachers to receive at the beginning of the school year and continue to require attestation forms regarding their attendance being taken accurately. The district will continue to utilize and update the Quick Reference Guides for Attendance Clerks and Registrars to facilitate communication processes in ensuring accurate data protocols/procedures are adhered to.

Current Status of Corrective Action (Implemented/Partially Implemented/Not Yet Implemented): Not Yet Implemented

Estimated Date of Full Implementation of Corrective Action: Beginning implementation SY 2022-2023

Recommendation 4 PGCPs should implement a process to utilize data in the subsequent reporting to identify school-level recordkeeping issues and increase accountability.

PGCPs Response:

Opinion (Concur/NonConcur): **Concur**

Corrective Action Plan (Provide Narrative Response):

PGCPs has added additional procedures to the MSDE Early Attendance submission and the End of Year Attendance submission to identify students that were not coded correctly during the September Attendance submission. This information is then used to code the students properly within the subsequent reporting windows based on the guidance provided by MSDE within the data collection manuals. This information is also shared with central office leadership as well as with school-based leadership to identify areas where additional professional development and/or resources are needed.

Current Status of Corrective Action (Implemented/Partially Implemented/Not Yet Implemented): Implemented

Estimated Date of Full Implementation of Corrective Action: This has been completed for reporting of SY22 Early Attendance data within the reporting window.

If you have any questions, please do not hesitate to contact Dr. Douglas A. Strader, Chief Accountability Officer at 301-952-6194 or doug.strader@pgcps.org.

Sincerely,



Monica E. Goldson, Ed.D.
Chief Executive Officer

c: Juanita Miller, Ed.D., Chair, Board of Education
Douglas A. Strader, Ed.D., Chief Accountability Officer